

Kapiti Coast District Plan Change 1D: Reclassification of Arawhata Road, Ventnor Drive, and Tutanekai Street

Section 32 of the Resource Management Act 1991 – Evaluation Report

June 2022

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1. Introduction

This evaluation report has been prepared, in accordance with section 32 of the Resource Management Act 1991 (the RMA), to support a proposed change to the Operative Kapiti Coast District Plan 2021 (the District Plan) titled Plan Change 1D.

Plan Change 1D seeks to reclassify three roads in the Kapiti District in the District Plan's transport network hierarchy¹, which differentiates roads by function. Routes at the top of the hierarchy are generally main arterial routes with higher traffic volumes and may have a higher speed limit. Routes at the lower end tend to have a local access function with lower traffic volumes, and as a result offer higher levels of safety for access to sites. The management of activities for road safety purposes depends on the status of the route under this hierarchy, such as seeking to avoid reversing from a site onto a road on those routes that carry more traffic where this increases the safety risk.

There are two parts to Plan Change 1D:

- 1) to reclassify Arawhata Road from a Neighbourhood Access Route/Local Road in the District Plan to the higher level of Local Community Connector Road to reflect its function in the roading hierarchy and to ensure the route is safe, fit for purpose, and does not have its function and operation unreasonably compromised by other activities²; and
- 2) to correct a historical error in the classification of Tutanekai Street and Ventnor Drive to ensure that their transport network hierarchy classification is accurate, aligns with their function, and reflects the projected transport demand safely and efficiently.³

2 The Issues

Reclassification of Arawhata Road

Plan Change 1D seeks to reclassify Arawhata Road from a Neighbourhood Access Route in the District Plan (i.e. at the lowest level in the transport network hierarchy as identified in TR-Table-7 – Transport Network Hierarchy and District Plan Map 12 Historical, Cultural, Infrastructure, Districtwide) to the higher level of Local Community Connector Route. Local Community Connector Routes are defined as larger urban roads linking local roads to the connector network.

The differences between the two road classifications under the Transport Network Hierarchy are shown in the table below:

Neighbourhood Access Route	Local Community Connector Route
<p>Roads providing direct access for residential and other areas of development in urban areas, with more than on intersection to other local or collector roads, and:</p> <ul style="list-style-type: none">• provides access to:<ul style="list-style-type: none">○ local residential neighbourhoods;○ schools;○ reserves.	<ul style="list-style-type: none">• Larger urban roads linking local roads to the connector network.• In rural areas, includes minor roads linking smaller rural communities to the connector network;• provides main access routes through suburbs;• connect local centres;

¹ See Table TR-7 in the Transport section of the District Plan.

² See District Objective DO-14 Transport and Access in the District Plan.

³ See Policy TR-P1 Integrated Transport and Urban Form in the District Plan.

<ul style="list-style-type: none"> • can include local walkways, beach access, residential lanes; • will be low speed; • will have low traffic volume. 	<ul style="list-style-type: none"> • traffic movements mainly locally generated; • significant walkways/cycleways between local centres, schools and employment areas; • may be some routes with relatively high traffic volumes; • expect moderate speed.
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Arawhata Road plays an important role as a local community connector road that connects Kapiti Road to Mazengarb Road and Tutanekai Street. Traffic levels on this road are also similar to other Local Community Connectors and higher than would be expected on a neighbourhood access route. Despite its role and importance in the transport network, it is not currently recognised as a Local Community Connector Route in the District Plan. Changes in use and development of land accessing Arawhata Road (that propose reversing onto the road) can have negative impacts on the road’s safe and efficient operation.

The reclassification is more appropriate for the existing and projected traffic volume in Arawhata Road and will align its classification with that of Mazengarb Road (from which Arawhata Road’s traffic flows to and from) as a Local Community Connector Route. It will also align it with Waka Kotahi’s One Network Road Classification ‘movement’ categories,⁴ which shift the focus from the volume of vehicles on a road to the functional importance of a road for moving people and goods.

Reclassifying Arawhata Road as a Local Community Connector Route will introduce more stringent controls for new developments that rely on Arawhata Road for vehicle access. New developments will need to be designed so that where onsite parking or loading is provided, a vehicle can turn around on-site to avoid reversing into Arawhata Road.

The reclassification proposed by Plan Change 1D will not affect existing properties that gain access via Arawhata Road unless additional residential units or subdivision are proposed. Property owners will not be required to provide additional space in which to manoeuvre vehicles to leave in a forward direction simply because the classification of the road is changing. However, proposed subdivision and development would trigger the requirement for on-site manoeuvring under permitted activity rule TR-R3, standard 12 – Manoeuvring, as follows:

Site access and loading for vehicles.

12. *Manoeuvring –*

- a. *Private residential access - unless the driveway accesses directly from a Neighbourhood Access Route, sufficient manoeuvring space must be provided on-site to ensure no reversing onto the road is necessary. Note: for clarification see the Transport Network Hierarchy.*

⁴ <https://www.nzta.govt.nz/planning-and-investment/planning/one-network-framework/movement-and-place-classification/>

Ensuring the correct classification of Tutanekai Street and Ventnor Drive in the transport network hierarchy

Plan Change 1D also seeks to correct a historical classification error of Tutanekai Street and Ventnor Drive.

The 1999 version of the District Plan shows Tutanekai Street as a Community Connector Route and Ventnor Drive as a notional road⁵. Prior to the Expressways project a notional road was marked on the District Plan's map as it had been proposed to extend Ventnor Drive to connect Old State Highway One to Mazengarb Road (the map in Annex 1 shows the current District Plan map).

When the 2012 Proposed District Plan was drafted, the Local Community Connector Route location was erroneously moved to Ventnor Drive and Tutanekai Street appeared as a Neighbourhood Access Route. This does not reflect actual use of Ventnor Drive, which is a relatively small, largely residential, no exit cul de sac. The notional road was not progressed and existing physical and legal barriers, including crossing a railway and crossing privately owned land, would make the construction of such a road today extremely difficult. Removing the notional road from the District Plan map requires correction through a statutory plan change process.

This error also means despite the Tutanekai Street's actual role and function being that of a Local Community Connector Route, it is not managed or considered in this way under the District Plan. This has potential to create adverse transport network safety and efficiency effects and needs to be amended through the plan change process. Tutanekai Street also has several community facilities located along the route including a hospital, and childcare and recreational facilities.

The timing of Plan Change 1D to correct this error is important as Tutanekai Street (and part of Arawhata Road) lies within a walkable catchment of the Metropolitan Centre Zone and the Paraparaumu Rail Station. Under the National Policy Statement on Urban Development 2020, and the Resource Management (Enabling Housing and Other Matters) Amendment Act 2021, the Council is required to notify a plan change no later than 20 August 2022 to increase the amount of permitted development within the General Residential Zone across the District, and further enable higher density residential development within a walkable catchment of the District's centres zones and rapid transit stops. The amount of additional permitted residential development this will enable presents a greatly increased risk to the safe and efficient operation of Tutanekai Street if permitted activity development is not required to provide for vehicles leaving a site in a forward direction onto the road.

Plan Change 1D aims to remove the Local Community Connector Route status from Ventnor Drive (reverting Ventnor Drive to a Neighbourhood Access Route), and to reinstate Local Community Connector Route status to Tutanekai Street on the District Plan's Transport Network Hierarchy and District Plan Map 12. These proposed changes are shown in the attached map (Annex 2).

3 Strategic Directions

The aim of this plan change is to ensure that the district's transport network is accurately classified so the Council can sustainably manage the district's physical resources to meet the reasonably foreseeable needs of future generations, and to enable people and communities to provide for their health and safety under the RMA (Part 2, s5).

Relevant objectives from the Strategic Directions chapter of the Plan are tabled below.

⁵ A 'notional road' is used to show a possible or intended route, but the actual road may never be created.

DO-14	Access and Transport
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To ensure that the transport system in the District:

1. integrates with land use and urban form and maximises accessibility;
2. improves the efficiency of travel and maximises mode choice to enable people to act sustainably as well as improving the resilience and health of communities;
3. contributes to a strong economy;
4. avoids, remedies or mitigates adverse effects on land uses;
5. does not have its function and operation unreasonably compromised by other activities;
6. is safe, fit for purpose, cost effective and provides good connectivity for all communities; and
7. provides for the integrated movement of people, goods and services.

This objective outlines how the Council will manage the transport system to ensure it is well integrated with land use and urban form, is efficient, safe, and does not have its function and operation unreasonably compromised by other activities.

DO-15	Economic Vitality
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To promote sustainable and on-going economic development of the local economy, including the rural sector, with improved number and quality of jobs and investment through:

1.
 - a. encouraging *business activities* in appropriate locations within the District, principally through differentiating and managing various types of *business activities* both on the basis of the activity, and the potential local and strategic *effects* of their operation;
 - b. reinforcing a compact, well designed and sustainable regional form supported by an integrated *transport network*;
 - c. enabling opportunities to make the economy more resilient and diverse;
 - d. providing opportunities for the growth of a low carbon economy, including clean technology;
 - e. minimising *reverse sensitivity effects* on *business activities*, including *primary production activities*; and
 - f. enhancing the amenity of *Working Zones*;

while:

2.
 - a. ensuring that economic growth and development is able to be efficiently serviced by *infrastructure*;
 - b. encouraging commercial consolidation and the co-location of community services and facilities primarily within the *Paraparaumu Sub-Regional Centre* and *Town Centres*; and
 - c. managing contamination, pollution, odour, noise and glare, associated with *business activities*, including *primary production activities*.

This strategic direction recognises the role the transport network plays in supporting and serving economic growth and the development of a sustainable regional form.

4 Response to the Issue: Proposed Plan Change 1D

The Plan Change proposes to resolve the issues by reclassifying routes appropriately for their current use. The map attached (Annex 2) illustrates the proposed changes to the District Plan maps.

The traffic levels on Arawhata Road are almost identical to those on Mazengarb Road, yet the roads are currently classified differently in the transport network hierarchy. Arawhata Road is identified as being the lowest Neighbourhood Access Route level, whilst Mazengarb Road is classified at a higher level on the hierarchy as a Local Community Connector Route. This is even though both routes:

- form part of the same link on the transport network;
- are larger roads;
- provide a main access route through the suburbs; and
- provide cycle, walking, public transport, and road access between schools, residential and employment areas.

Reclassifying Arawhata Road as a Local Community Connector Route will align it with Mazengarb Road's classification and with Waka Kotahi's national movement classification system. This is appropriate for Arawhata Road as it does not meet the definition of a Neighbourhood Access Route. Neighbourhood Access Routes typically have lower levels of traffic, are narrower, provide more localised access, and do not accommodate the levels of public transport, walking and cycling activity that a road such as Arawhata Road does.

The current classification as a Neighbourhood Access Route under the District Plan allows reversing onto Arawhata Road. There are safety risks with this due to the relatively high traffic levels, number of vehicle crossings and intersections, and use of the road by pedestrians, cyclists and buses. The reclassification will attribute to a safer environment on Arawhata Road as new developments that provide parking or loading onsite will be required to provide onsite manoeuvring areas so that vehicles can exit in a forward direction onto Arawhata Road.

5 Section 32 Requirements

Section 32 of the RMA requires, broadly, that before advancing plan provisions a Council must evaluate whether the proposed provisions are the most appropriate way to achieve the purpose of the RMA.

S.32 (1)(a) of the RMA requires that an evaluation must examine the extent to which any proposed objectives are the most appropriate way to achieve the purpose of the RMA. No new objectives, and no changes to existing District Plan objectives, are proposed by the Plan Change. The relevant District Plan objectives for character and amenity values, and access and transport remain appropriate.

S.32 (1)(b) of the RMA requires an evaluation of whether the provisions proposed by the Plan Change are the most appropriate way to achieve the District Plan objectives. S.32 (3) clarifies that, for a plan change, this evaluation must consider both the objective of the plan change (the purpose of the plan change) and the District Plan objectives, to the extent that those objectives remain relevant. The evaluation is required to:

- identify and consider other reasonably practicable options for achieving the objectives (s.32 (1) (b) (i)); and
- assess the efficiency and effectiveness of the proposed provisions in achieving the objectives (s.32 (1) (b) (ii)) and this is most usefully done by comparison with the reasonably practicable alternative options.

The assessment of efficiency and effectiveness required by s.32 (1) (b) (ii) is required to identify and assess the benefits and costs of the environmental, economic, social and cultural effects anticipated from implementing the proposed provisions. This must include consideration of opportunities for economic growth and employment that are anticipated to be provided or reduced. Benefits and costs are to be quantified, if practicable. The s.32 (1) (b) (ii) assessment is also required to assess the risk of acting or not acting, if there is insufficient information about the subject matter of the provisions.

The evaluation is required to contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects anticipated from implementing the proposal.

6 Purpose of the Plan Change

The Plan Change is an ‘amending proposal’ for the purpose of s.32 of the RMA. This evaluation is required to consider the objective or purpose of the Plan Change, in addition to the District Plan’s objectives.

The route classifications in the District Plan’s transport network hierarchy are not aligned with current use of Arawhata road, Tutaneikai Street or Ventnor Drive. Plan Change 1D seeks to align classifications of these roads in the District Plan with their respective uses. The plan change will also require most new developments to provide an onsite area for vehicles to manoeuvre so that they can exit onto the road in a forward manner.

The plan change will ensure that the safety and efficiency of the three roads and the effects that arise from the current and future use of these roads are appropriate and consistent with the objectives of the district plan and the purpose of the RMA.

7 Relevant considerations under Part 2 of the RMA

In carrying out a s.32 analysis, an evaluation is required as to how the proposal achieves the purpose and principles in Part 2 of the RMA. Section 5 sets out the purpose of the RMA, which is to promote the sustainable management of natural and physical resources.

Sustainable management ‘*means managing the use, development, and protection of natural and physical resources to enable people and communities to provide for their social, economic and cultural wellbeing and for their health and safety, while –*

- (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment’.*

In achieving this purpose, authorities need also to recognise and provide for the matters of national importance identified in s.6, have particular regard to other matters referred to in s7, and take into account the principles of the Treaty of Waitangi referred to in s8.

Section 6 – Matters of national importance

There are no s.6 matters relevant to this topic.

Section 7 – Other matters

S.7(b), “the efficient use and development of natural and physical resource” is relevant to this topic as classifying routes in the transport network is a physical resource that we want to ensure operates safely and efficiently.

Section 8

As part of the draft consultation Council consulted with the three local iwi, Te Āti Awa ki Whakarongotai, Ngā Hapū o Ōtaki, and Ngāti Toa Rangātira, as a statutory party under the RMA. There were no issues raised during this time, and there are no particular s.8 matters directly relevant to this topic.

8 Relevant Higher-Order Statutory Instruments

Under s.75(3) of the RMA, a district plan must give effect to:

- (a) any national policy statement; and
- (b) any New Zealand Coastal Policy statement (the NZCPS);
- (ba) any national planning standard; and
- (c) any regional policy statement.

The relevance of the higher-level statutory planning documents to the amendments proposed by the Plan Change are discussed below.

8.1 National Policy Statements

There are five National Policy Statements (NPSs) currently in force:

- New Zealand Coastal Policy Statement 2010
- NPS for Electricity Transmission 2008
- NPS for Renewable Electricity Generation 2011
- NPS for Freshwater Management 2020
- NPS on Urban Development 2020

The NPS on Urban Development is relevant to this topic, in particular the part in bold below.

NPS	Relevant Objectives / Policies
<i>NPS on Urban Development 2020</i>	<i>Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.</i> <i>Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</i> <ul style="list-style-type: none"><i>a) have or enable a variety of homes that:</i><ul style="list-style-type: none"><i>(i) meet the needs, in terms of type, price, and location, of different households; and</i><i>(ii) enable Māori to express their cultural traditions and norms; and</i>

	<p>b) <i>have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and</i></p> <p>c) <i>have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and</i></p> <p>d) <i>support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and</i></p> <p>e) <i>support reductions in greenhouse gas emissions;</i></p> <p>f) <i>and are resilient to the likely current and future effects of climate change.</i></p>
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8.2 New Zealand Coastal Policy Statement

The purpose of the New Zealand Coastal Policy Statement 2010 (NZCPS) is to state objectives and policies to achieve the purpose of the RMA in relation to the protection and enhancement of the coastal environment of New Zealand. The NZCPS 2010 took effect on 3 December 2010.

There are no NZCPS provisions relevant to Plan Change 1D.

8.3 National Planning Standards

National Planning Standards are intended to reduce plan complexity and provide a home for national direction. The purpose of the National Planning Standards is to improve the efficiency and effectiveness of the planning system by providing nationally consistent structure, format, definitions, noise and vibration metrics, electronic functionality and accessibility for regional policy statements, regional plans, district plans and combined plans under the RMA. The intention is that this will make council plans and policy statements more efficient and easier to prepare and use⁶. The Council issued a public notice in 2021 notifying amendments to the District Plan to give effect to the National Planning Standards 2019⁷.

The National Planning Standards require that transport-related matters be included in the Transport chapter in the in the Energy, Infrastructure and Transport section of the District Plan. The transport network hierarchy is identified on the District Plan maps, which have also been amended to be consistent with National Planning Standards requirements.

The proposed amendments to the District Plan are consistent with the requirements of the National Planning Standards.

8.4 National Environmental Standards

There are nine National Environmental Standards (NESs) currently in force:

- NES for Air Quality 2011
- NES for Sources of Human Drinking Water 2007

⁶ <https://www.environmentguide.org.nz/rma/planning-documents-and-processes/national-planning-standards/>

⁷ <https://www.kapiticoast.govt.nz/whats-on/have-your-say/public-notice/operative-kapiti-coast-district-plan-2021-recognition-of-national-planning-standards-2019/>

- NES for Telecommunication Facilities 2016
- NES for Electricity Transmission Activities 2009
- NES for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
- NES for Plantation Forestry 2017
- NES for Freshwater 2020
- NES for Marine Aquaculture 2020
- NES for Storing Tyres Outdoors 2021.

There are no National Environment Standards relevant to Plan Change 1D.

8.5 Wellington Regional Policy Statement

The Operative Wellington Regional Policy Statement 2013 (RPS) provides an overview of regional resource management issues and the ways in which integrated management of natural and physical resources will be achieved.

District plans are required to give effect to the policies 1-34 of the RPS, and to have particular regard to policies 35-60.

Reclassifying routes under the District Plan’s transport network hierarchy is important to recognise actual use of the routes, and attributes to economic, social wellbeing, and health and safety outcomes. Arawhata Road and Tutanekai Street are important local connectors which provide access for people between key facilities.

The table below identifies the relevant provisions and resource management topics for transport contained in the RPS relevant to Plan change 1D. Plan Change 1D is considered to give effect to Objective 22 and the related policies.

Regional Policy Statement for the Wellington Region	
Objective 22	<p>A compact well designed and sustainable regional form that has an integrated, safe and responsive transport network and:</p> <p>(a) ...</p> <p>(b) ...</p> <p>(c) ...</p> <p>(d) ...</p> <p>(e) ...</p> <p>(f) ...</p> <p>(g) ...</p> <p>(h) ...</p> <p>(i) integrated land use and transportation</p> <p>(j) ...</p> <p>(k) efficiently use existing infrastructure (including transport network infrastructure)</p> <p>(l) ...</p>
Policy 54	Achieving the region’s urban design principles – consideration

(R)	When considering an application for a notice of requirement or a change, variation or review of a district or regional plan, for development, particular regard shall be given to achieving the region's urban design principles in Appendix 2 (including considerations of choice in transport options, creating urban environments that provide opportunities for all, ensuring public spaces are accessible by everybody, including people with disabilities, and good connectivity).
Policy 57 (R)	<p>Integrating land use and transportation – consideration</p> <p>When considering an application for a resource consent, notice or requirements, or a change, variation or review of a district plan, for subdivision, use or development, particular regard shall be given to the following matters, in making progress towards achieving the key outcomes of the Wellington Regional Land Transport Strategy:</p> <p>(a)...</p> <p>(b) connectivity, with, or provision of access to, public services or activities, key centres of employment activity or retail activity, open spaces or recreational areas;....</p>
Policy 58 (R)	<p>Co-ordinating land use with development and operation of infrastructure – consideration</p> <p>When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan for subdivision, use or development, particular regard shall be given to whether the proposed subdivision, use or development is located and sequenced to:</p> <ol style="list-style-type: none"> a. make efficient and safe use of existing infrastructure capacity; and/or b. coordinate with the development and operation of new infrastructure.

M = policies which must be **implemented** in accordance with methods stated in the RPS

R = policies to which **particular regard** must be had when varying a district plan

The district plan must have particular regard to policies 54, 57, and 58 of the RPS.

8.6 Regional Plans

There are currently five operative regional plans for the Wellington Region (which will be replaced by the proposed Natural Resources Plan for the Wellington Region), listed below:

- Regional Freshwater Plan for the Wellington Region, 1999
- Regional Coastal Plan for the Wellington Region, 2000
- Regional Air Quality Management Plan for the Wellington Region, 2000
- Regional Soil Plan for the Wellington Region, 2000
- Regional Plan for Discharges to Land, 1999

These plans assist the regional council to carry out its functions in order to achieve the purpose of this RMA. These plans set out how the regional council manages natural and physical resources under the jurisdiction of the regional council under s.30 of the RMA.

The Plan Change manages activities that fall under the jurisdiction of the Kāpiti Coast District Council under s.31(1)(b)(iii) and does not venture into the jurisdiction of the Regional Council. On this basis none of these regional plans are relevant to the plan change.

8.7 Proposed Natural Resources Plan – Appeals Version (PNRP)

The PNRP is still in the process of settling appeals to the Environment Court, however, once those are resolved it will replace the existing five operative regional plans identified above.

In a similar light to the assessment above regarding the relevance of the five operative regional plans, the PNRP is not directly relevant to this plan change.

9 Other Relevant Plans and Strategies

9.1 Kapiti Coast District Long Term Plan (LTP)

The Council's LTP (2021-2041)⁸ addresses four aspects of wellbeing: social, cultural, economic, and environmental wellbeing. The overall goal is for a vibrant and thriving Kāpiti with healthy, safe, and resilient communities. Underlying these four aspects is the principle that Mana Whenua and Council have a mutually mana-enhancing partnership.

The stated outcome for community wellbeing is that 'communities are resilient, safe, healthy and connected. Everyone has a sense of belonging and can access the resources and services they need'. This is explained as meaning that:

'Our communities (groups and individuals) have access to services and facilities necessary to meet their basic needs to cope with the demands of, and unforeseen disruptions to, their daily lives. They have access to adequate permanent shelter; necessary health services; food; water; education; transport options and networks (roading, rail, cycle, sea and air); telecommunications; and social networks, that they may prosper and thrive to fulfil their potential'.

Plan Change 1D contributes to achieving the outcome for community wellbeing as reclassified routes in the transport network hierarchy will help to better connect the Kapiti District's community. New developments on Arawhata Road, where owners choose to provide off street carparking, will need to provide onsite turning areas which will contribute to increased safety to road users including vehicles, cycles and pedestrians.

The LTP 2021– 41 sets out the aims to secure the district's future over the next 20 years. This includes the investment needed to support a thriving community and ensure that the district has the infrastructure, services and facilities needed to meet current and future challenges.

Strategic directions of the LTP include planning for growth. This is relevant to ensuring that roads are correctly classified in the District Plan to reflect current use and to plan for future growth where necessary.

9.2 Other relevant central and local government plans and strategies

The following central government and Kāpiti Coast District Council plans/strategies are also relevant to Plan Change 1D:⁹

⁸ <https://www.kapiticoast.govt.nz/your-council/forms-documents/annual-and-long-term-plans/long-term-plan/>

⁹ <https://www.kapiticoast.govt.nz/your-council/forms-documents/policy-and-strategy/council-strategies/>

Plan / Strategy	Organisation	Relevant Provisions
Te Tupu Pai – Growing Well	Kāpiti Coast District Council	This document sets out the proposed approach for growing the Kapiti District over the next 30 years. It links to the NPS-UD and reflects the need for the Kapiti Coast, as a Tier 1 urban environment, to allow for walkable neighbourhoods and access to open spaces as denser urban areas are developed.
Te Ara ki te Ora – Road to Zero	Ministry of Transport	The Road to Zero strategy sets out a vision for New Zealand where no one is killed or seriously injured in road crashes. It includes guiding principles for road network design and road safety decisions and sets safety targets for 2030. It defines 5 focus areas for the next decade and includes an accountability framework to achieve these.
Government Policy Statement on land transport 2021 ¹⁰	Ministry of Transport	The Government Policy Statement on land transport (GPS) sets out how money from the National Land Transport Fund is allocated towards the Government’s transport priorities. It sets out funding ranges for activities such as public transport, state highway improvements, local and regional roads and road safety. Each GPS sets out the priorities for the following 10-year period and is reviewed and updated every 3 years.
Streetscape Strategy and Guideline (2008)	Kāpiti Coast District Council	The Kāpiti Coast district is a rapidly growing area. There is a need to ensure streets are safe for users faced with increased vehicular, pedestrian and cycle traffic. This document sets out the process to resolve competing interests in regard to streetscapes.
Sustainable Transport Strategy 2020	Kāpiti Coast District Council 2020	Focus Area 2: Integrating Land Use and Development, and Focus Area 3: Safety are relevant to Plan change 1D as they relate to role and functions of roads as laid out in the District Plan.
Wellington Regional Land Transport Plan 2021	Greater Wellington Regional Council	Objective 2 Transport and land use are integrated to support compact urban form, liveable places, and a strong regional economy. Policy 2.4

¹⁰ <https://www.transport.govt.nz/area-of-interest/strategy-and-direction/government-policy-statement-on-land-transport-2021/>

		<p>Ensure new transport infrastructure is designed and located to enhance access and support compact urban form consistent with the Regional Policy Statement.</p> <p>Objective 4</p> <p>People can move around the Wellington Region safely.</p>
Kāpiti Coast District Council Subdivision and Development Principles and Requirements 2012 (SDPR)		<p>The SDPR applies to all subdivision and development in the District via the District Plan¹¹.</p> <p>The SDPR includes provisions that require resource consents to include design and access statements and road safety audits. The requirements are to identify and address potential road safety issues that could arise from proposed subdivision and development.</p> <p>The road network hierarchy is used in the SDPR to specify the functions, examples, and design comments relevant when considering resource consent applications that access a road in the hierarchy.</p>

In addition to the above, Council's Plan Change 2, an intensification planning instrument, will be publicly notified by 20 August 2022. This plan change will incorporate the Medium Density Residential Standards into the General Residential Zone provisions of the District Plan. The draft plan change also suggests all of Tutaneke Street and a significant part of Arawhata Road fall within a 800m walkable catchment of the Paraparaumu Metropolitan Centre. This increases the importance of amending the District Plan to ensure future developments on these streets are suitably designed with traffic safety in mind.

10 Planning Documents Recognised by Iwi Authorities

There are three iwi recognised as holding mana whenua within the Kāpiti Coast District:

- Te Ātiawa ki Whakarongotai;
- Ngāti Toa Rangātira; and
- Ngā Hapū o Ōtaki.

There are four documents recognised by iwi authorities and lodged with the Council in the Kāpiti Coast District, comprising:

- a) Proposed Ngāti Raukawa Ōtaki River and Catchment Iwi Management Plan 2000 (operative 10 April 2001);
- b) Nga Korero Kaupapa mo Te Taiao: Policy Statement Manual for Kapakapanui: Te Runanga O Āti Awa ki Whakarongotai Inc;

¹¹ Note that the Land Development Minimum Requirements (LMDR) is proposed to replace the SDPR as part of Plan Change 2.

- c) Te Haerenga Whakamua – A Review of the District Plan Provisions for Māori: A Vision to the Future for the Kāpiti Coast District Council District Plan Review 2009-12 – 2012; and
- d) Whakarongotai o te moana Whakarongotai o te wā – Kaitiakitanga Plan for Te Ātiawa ki Whakarongotai. 2019.

The changes sought to the transport network hierarchy under Plan Change 1D fall within the rohe of Te Ātiawa ki Whakarongotai, therefore the documents Nga Korero Kaupapa, Te Haerenga Whakamua, and Whakarongotai o te moana Whakarongotai o te wā are relevant to this plan change.

Nga Korero Kaupapa o Te Taiao

The document outlines the vision, intent and objectives for compliance with tikanga standards for the protection and management of the environment as determined by Te Runanga O Āti Awa ki Whakarongotai Inc with respect to the following topics:

- Disposal and treatment of effluent;
- Stormwater and runoff;
- Heritage protection and management; and
- Representation.

Plan Change 1L does not create any inconsistency between the District Plan and this document.

Te Haerenga Whakamua

Input from tāngata whenua was an important part of developing the Proposed District Plan (PDP), with 23 meetings held from December 2010 through October 2012 between Council staff and a Tāngata Whenua working party nominated by Te Whakaminenga o Kāpiti.

The Tāngata Whenua Working Party was established in 2010 as a mechanism for the District's three iwi (Te Āti Awa ki Whakarongotai, Ngāti Raukawa (Ngā Hapū o Ōtaki) and Ngāti Toa Rangātira) to participate in the review of the District Plan. The mandate for the working party was to review all aspects of the District Plan on behalf of Te Whakaminenga o Kāpiti and recommend the direction for iwi policy and the Māori world view within the PDP process. This process resulted in the document Te Haerenga Whakamua being approved by Te Whakaminenga o Kāpiti in March 2012 and endorsed by Council on 27 September 2012. There are no relevant provisions to the plan change and the change is consistent with the principles of this document.

Whakarongotai o te moana Whakarongotai o te wā

The purpose of this document is to identify the key values, objectives and policies of Te Ātiawa ki Whakarongotai that guide their kaitiakitanga as mana whenua. The key intention of the plan is to be internally focused, however it is deliberately lodged with the Council to be taken into account when district plans are prepared or changed¹². There are no relevant provisions to the plan change and the change is consistent with the principles of this document.

11 Engagement and Feedback

During the preparation of the Plan Change the Council consulted with statutory parties, as required under clause 3 and 4A of Schedule 1 of the RMA, on or by 20 April 2022 with a 15

¹² <https://teatiawakikipiti.co.nz/key-documents/takw-kaitiakitanga-plan-v6-online/>

working day period (closing 11 May), in which parties could provide feedback. The statutory parties that were consulted on draft Plan Change 1D are: the Ministry for the Environment, other councils within the greater Wellington region, iwi in the Kapiti District, and property owners in Arawhata Road, Tutanekai Street and Ventnor Drive.

No concerns or objections were raised by Ministry for the Environment, iwi, or other councils.

Council received feedback from seven property owners. There were no objections to reclassification of the roads, but some concerns were raised about traffic speeds and volumes in Tutanekai Street and Arawhata Road. These matters have been referred to the Transport and Roding section of the Council. Feedback about traffic speed and volume is out of scope of the plan change as route reclassification does not mean that there will be any increase in traffic speed or volume on any of the streets.

12 Scale and Significance

Having regard to the relevant District Plan objectives and relevant provisions of higher order documents, strategies and other documents discussed in Sections 8 to 11 of this report, this section evaluates the scale and significance of the effects of the Plan Change.

The proposed reclassifications:

- Are necessary to ensure a safe and efficient local road network.
- Are limited in scale and geographical area as they are relevant to three roads in the district – Arawhata Road, Tutanekai Street and Ventnor Drive.
- Are relatively minor in that there will be no change to traffic volume, speed or flow, but technical inconsistencies and a past classification error will be corrected.
- Will result in a minor shift from the status quo for properties accessing Tutanekai Street and Arawhata Road by requiring new subdivision and development to provide sufficient on-site manoeuvring space to enable vehicle to leave in a forward direction if on-site parking is proposed.
- Are not related to any significant matter in any higher-level statutory planning document.
- Are not understood to impact negatively on the interests of iwi.
- Will result in positive road safety and efficiency effects that are well understood and carry a low degree of risk and uncertainty.

Feedback from consultation did not identify any concerns with the Plan Change to reclassify the routes in the District Plan's transport network hierarchy.

Overall, the scale and significance of the proposed amendments is low.

Section 32(2)(b) of the RMA requires that, where practicable, the benefits and costs of a proposal are to be quantified. Taking in to account the low scale and significance associated with this plan change, the quantification of costs and benefits is not considered necessary.

13 Reasonably Practicable Alternatives

Option 1: Status quo (retain current transport network hierarchy classifications in the District Plan, without change).

Option 2: Plan Change 1D:

- (i) reclassify Arawhata Road to Local Community Connector to accurately reflect its use and function, as a connection with Mazengarb Road;

- (ii) remove the notional road from Ventnor Drive as shown on the District Plan maps;
- (iii) reclassify Ventnor Drive to Neighbourhood Access Route to accurately reflect its use and function; and
- (iv) reinstate Tutanekai Street as a Local Community Connector route to accurately reflect its use and function.

14 Evaluation of Plan Change

	Option 1: Status quo (retain current classifications in the District Plan's transport network hierarchy without change)	Option 2: (Plan Change 1D) reclassify Arawhata Road from Neighbourhood Access Route to Local Community Connector, reinstate Tutanekai Street from Neighbourhood Access Route to Local Community Connector, and remove the notional road from Ventnor Drive and correct its classification to Neighbourhood Access Route.
Benefits and Costs: Environmental	Neutral: there are no environmental costs or benefits.	Neutral: there are no environmental costs or benefits.
Benefits and Costs: Economic	<p>Costs: Potential economic costs associated with reduced safety and efficiency of the road network.</p> <p>Benefit: Potential economic benefit to developers who will continue to not need to provide sufficient on-site manoeuvring space to enable vehicles to leave in a forward direction, if proposing on-site car parking.</p>	<p>Costs: Potential additional economic costs to developers to provide sufficient on-site manoeuvring space to enable vehicles to leave in a forward direction.</p> <p>Benefit: roads will be properly classified. Routes will be aligned (e.g. Arawhata Road and Tutanekai Street). Arawhata Road as a Local Community Connector Route better reflects its actual use as an important arterial route in the Kapiti District.</p> <p>It will allow for safer developments on Arawhata Road and Tutanekai Street.</p>
Benefits and Costs: Social	<p>Cost: There is a safety issue for Arawhata Road and Tutanekai Street if new developments do not provide onsite areas for vehicles to turn.</p> <p>Benefit: There are no social benefits.</p>	<p>Benefit: If there are new developments on Arawhata Road or Tutanekai Street that provide access for vehicles these will need to provide onsite turning areas, which will provide for improved road safety and efficiency for people and goods moving around the district.</p>

Benefits and Costs: Cultural	There are no cultural benefits or costs.	There are no cultural benefits or costs.
Economic Growth and Employment Impacts	There are no economic growth and employment impacts.	Benefit: Arawhata Road is recognised under the District Plan as an important local connector that connects people to workplaces, and key local amenities. Greater safety and efficiency of movement of people and goods through the district supports economic growth and employment.
Risks of Acting / Not Acting	Incorrect classification of routes in the District Plan means potential road safety and efficiency effects affecting Arawhata Road and Tutanekai Street are not addressed. Conversely, potential subdivision and development accessing Ventnor Drive will be unnecessarily constrained to require vehicle to leave sites in a forward direction despite the real-world safety and efficiency reasons for requiring this not being relevant to Ventnor Drive.	Option 2 will eliminate the risks identified under Option 1. There are no risks associated with this option.
Scale and Significance	District-wide scale and low significance.	District-wide scale and low significance.
Efficiency	Retaining the current classifications could create issues for property owners or developers in future through the creation of unsafe vehicle departures from sites. The current classifications do not reflect actual use of the roads in question. This option is less efficient at achieving the objectives of the district plan and the objectives of the plan change, as it would leave the identified road safety and efficiency effects unaddressed.	Reclassifying the routes will reflect the actual use of the roads in question. It will allow for new developments on Arawhata Road and Tutanekai Street to be safer, and correctly classifies Ventnor Drive and Tutanekai Street under the District Plan. This option would efficiently achieve the objectives of the district plan and the objectives of the plan change by addressing and correcting identified road safety and efficiency effects.

Effectiveness	<p>The current classification is not appropriate and therefore not effective.</p> <p>This option is not effective at achieving the objectives of the district plan. The identified road safety and efficiency issues would remain at odds with the direction of the objectives of the district plan and would fail to address the objectives of the plan change.</p>	<p>Option 2 will ensure the District Plan's transport network hierarchy is up to date and reflects actual use of community routes.</p> <p>This option is effective at achieving the objectives of the district plan and the plan change as it will ensure the road hierarchy operates in a safe and efficient manner.</p>
Overall evaluation	<p>Option 2 (Plan Change 1D) will best reflect the use of these roads and their route-level in the District Plan's transport network hierarchy. It is the most efficient and effective method to achieve the objectives of the District Plan and the plan change. Ensuring correct route classification under the District Plan will address the road safety and efficiency issues identified under the current classification of the roads. Plan Change 1D is the most appropriate method to achieve Part II of the RMA.</p>	

15 Overall Conclusion

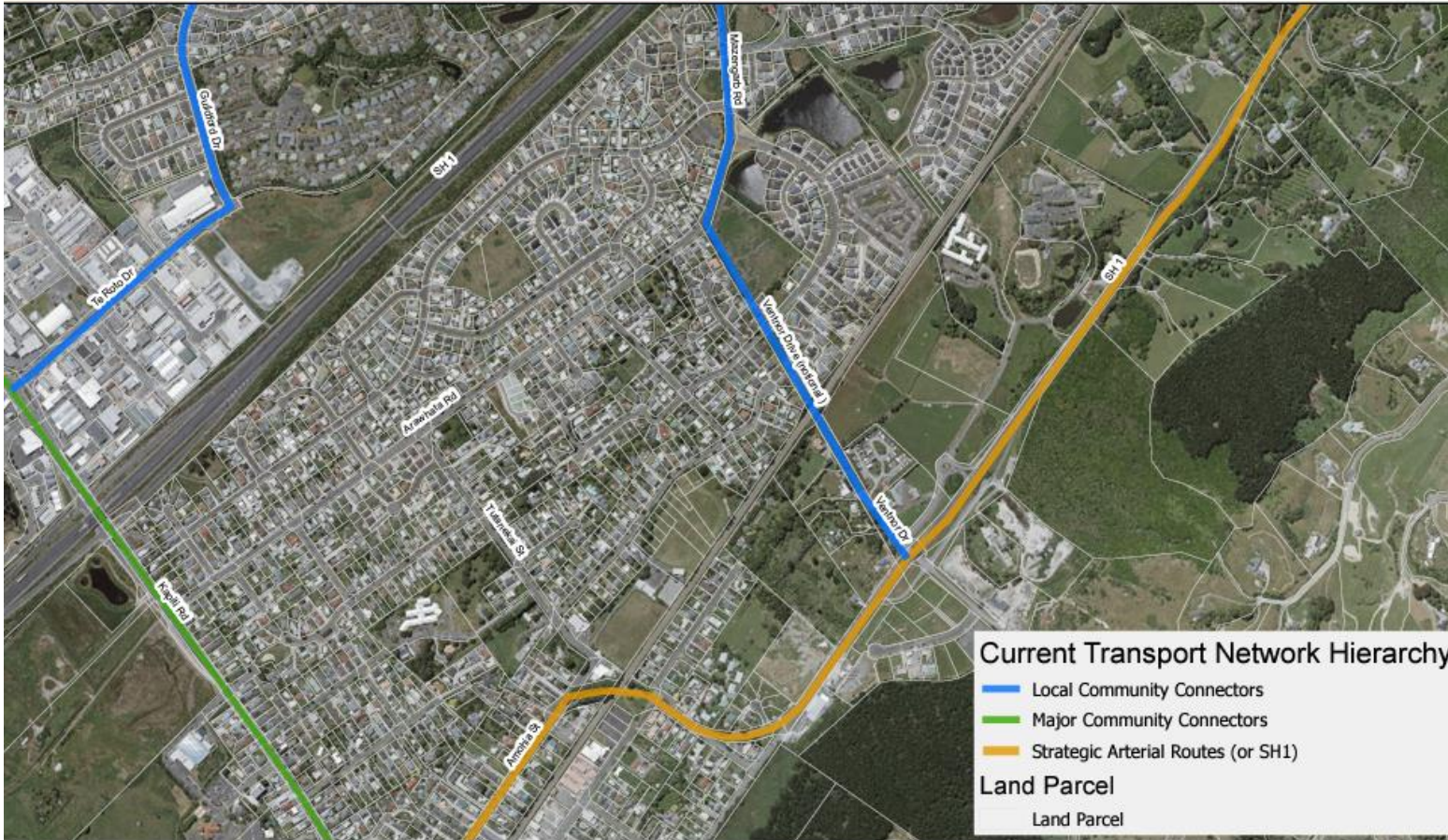
This evaluation has been undertaken in accordance with section 32 of the RMA in order to identify the need, benefits and costs and the appropriateness of the proposed plan change having regard to its effectiveness and efficiency relative to other means in achieving the purpose of the RMA.

The evaluation demonstrates that this proposed plan change is the best option as it:

- (i) Best gives effect to the higher order statutory planning documents
- (ii) Is the most efficient and effective way to achieve the purpose of the RMA, the District Plan objectives, and the objectives of the plan change
- (iii) Addresses the identified issue.

Annex 1: Current District Plan Map

Annex 1 - Current District Plan Map



Annex 2 – Map Showing proposed District Plan changes

